

I am submitting the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

I do not know what has possessed certain individuals to propose these changes to FCC rules, policies or procedures. But I do know that no so-called "public interest" should EVER supersede First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and therefore, they must not be adopted.

(1) The FCC must not force radio stations, and in particular, religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious, and other, broadcasters who resist advice from those who don't share their values would be allowed to face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment is clear: "Congress" (and by act of Congress, the FCC and other government agencies) "shall make no law respecting an establishment of religion, OR PROHIBITING THE FREE EXERCISE THEREOF; or abridging the freedom of speech, or of the press." By allowing people of, say, a non-religious background to dictate what viewpoints a religious broadcaster must present, you are, in my opinion, helping to prohibit the free exercise of religion, speech, or press within our country. And in my opinion, there is NO "public interest" that can justify this kind of restriction.

(2) Radio stations - even those of a non-religious nature - should not be turned into supposed "public forums" where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious (or even a secular) broadcaster conscientiously objects to the message. Again, the First Amendment, in my opinion, forbids imposition of message delivery mandates on any radio station - religious or otherwise.

(3) The FCC must not force revelation of specific editorial decision-making information. Insofar as I am aware, this has NEVER been the case with non-religious programming. Therefore, no

distinctions should be drawn for those that are religious or may have opinions differing from what some may consider "mainstream". People may complain about the content of such broadcasters. But it is not, nor should it ever be, their business to restrict or control it at any level. The choice of programming should not be dictated by any government agency – and proposals to force reporting on such things as who produced what programs does, in my opinion, intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. There is no need, in my opinion, for any such class distinction other than to prohibit the free exercise of religion, speech, or press. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves, in my opinion, implicitly results in coercion of certain broadcasters to "tow a mark" they should not have to. Those who stay true to their consciences and present only the messages that correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many broadcasters - including religious broadcasters - operate on tight budgets. Keeping the "electricity" flowing is often a challenge for them all. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. These tactics, in my opinion, are more those of a totalitarian state than they are of a free society such as the United States of America. We don't need "radio police" in our radio stations, and we don't need to have the stations pay for them. Nor do we need to make stations get up and move every so often for the sake of some so-called "public interest".!!! Not only do these proposals give that sense. But, even without giving that sense, the proposals result in raising costs that are unnecessary, and which would force service cutbacks, possibly ending the radio station's life. Thus, in the service of what some perceive as the "public interest", radio stations that cannot survive these tactics would be forced out of business. In my view, that is a detriment to the REAL

public interest, never mind restricting freedom of religion, speech and press.

It really surprises me that these proposals have come this far. Therefore, as a citizen of the United States, I strongly urge the FCC not to adopt any rules, procedures or policies such as those discussed above. They sound restrictive at minimum, and, in my opinion, they clearly seek to curtail freedom of religion, speech and press.

Thank you.